



SRS Citizens Advisory Board

Old Radioactive Waste Burial Ground

Meeting Summary

May 5, 1999
Aiken Federal Building
Aiken, SC

The Citizens Advisory Board (CAB) Environmental Remediation and Waste Management (ER&WM) Subcommittee Old Radioactive Waste Burial Ground (ORWBG) Focus Group met on Wednesday, May 5, 1999, 2:00 p.m., at the Aiken Federal Building, Aiken, S. C. The purpose of the meeting was to develop CAB draft motions on the Corrective Measures Study/Feasibility Study and the Resource Conservation and Recovery Act (RCRA) hazardous waste permit modification and review the path forward. Those in attendance were:

CAB Members

Karen Patterson, Admin.
Lead
Wade Waters
Brendolyn Jenkins

Stakeholders

Lee Poe, Tech. Lead
Jerry Devitt
Bill McDonell
Gene Rollins
Michael Moore, DHEC
Alan Eckmyre, SMS
Todd Crawford

DOE/Contractors

Rod Romando, DOE
Jim Cook, WSRC
Dave Amick, SAIC
Kelly Damon, WSRC
Tom Rehder, WSRC
John Bennett, BSRI
Ed McNamee, BSRI
Sonny Goldston, BNFL
Mervin Johns, BSRI
Elmer Wilhite, WSRC
Bill Maloney, WSRC
Joe Price, WSRC
Mike Griffith, WSRC

Karen Patterson, Administrative Lead, welcomed all in attendance and asked them to introduce themselves. Ms. Patterson stated that the members of the Focus Group usually representing the Environmental Protection Agency (EPA) and Department of Health and Environmental Control (DHEC) would not be present due to previously scheduled meetings. Ms. Patterson reviewed the agenda stating that the two draft motions entitled "Corrective Measures Study/Feasibility Study for the Old Radioactive Waste Burial Ground" (CMS/FS) and "Proposed Permit Modification Mixed Waste Management Facility At SRS Under South Carolina Hazardous Waste Management Regulations and Resource Conservation and Recovery Act (RCRA)" (RCRA Permit) would be discussed. She explained that Lee Poe, Technical Lead, would lead in the discussion of the two motions while she would record

comments on a flip chart.

Comments related to the specific draft CAB motions as recorded were as follows:

CORRECTIVE MEASURES STUDY/FEASIBILITY STUDY FOR THE OLD RADIOACTIVE WASTE BURIAL GROUND

1. Input to the decision process good.
2. Study should specify risk measures (Drinking Water Limits).
3. Discrepancy noted between assumed intruder barrier (concrete cap) failure at 500-years and projected intruder protection up to 10,000 years.
4. Waste removal costs high and of limited implementation.
5. No regulator/legal limits.
6. Good process to compare alternatives but should not be used to determine constituents of interest (COI) fate and transport modeling.
7. Most constituents of interest (COI) in ground water are of no concern over the long term.
8. Independent sanity checks of study needed.
9. Consider combining Feasibility Study/Proposed Plan.
10. Bio-barrier (cobbles) could be pirated for other use.
11. Fill solvent tank with a stable material but do not cover. Missed alternative. (Stabilize tank so it doesn't collapse.)
12. Allow public to review Statement of Basis (SB)/Proposed Plan (PP) at same time as regulators.
13. CERCLA/RCRA distinction is not clear to the public.
14. Help Focus Group/Citizens Advisory Board understand Federal Facility Agreement process.

PROPOSED PERMIT MODIFICATION MIXED WASTE MANAGEMENT FACILITY AT SRS UNDER SOUTH CAROLINA HAZARDOUS WASTE MANAGEMENT REGULATIONS AND RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

1. Clean up standards should be applied at the point of exposure.
2. Point of exposure should be at mouth of Four-Mile Branch.
3. Document for the public needs to be written so public can understand it. Too many referrals to other documents.
4. III.E.H.5.b - Install and operate; capture and remediate. Language needs to be changed.
5. Too many wells; too much monitoring (quarterly vs. annual) required.
6. Distinction between 4 mrem Residential vs. 15 mrem Industrial radiation exposure limits (All pathways – NRC) should be accommodated in prescribed actions.

Mr. Poe started by reviewing the major areas of the CMS/FS. He stated that the path forward would be to develop a draft CAB motion for acceptance at the full CAB meeting in Savannah May 24 and 25. He suggested that everyone document their comments by letter for transmittal to DOE, which would assure that DOE receives all the comments. While the significant comments would be included in the draft motion, there may be some comments that won't make the motion. Mr. Crawford was designated to draft up the motion based on comments already received and those obtained from this meeting.

Mr. Poe asked Bill McDonell to give a short presentation on his view of the CMS/FS document. Mr. McDonell summarized his conclusions as follows: (a) For a CERCLA remediation of the burial ground, only low mobility (COI) being leached from the burial ground were of potential concern, since most of the high mobility COI had already been leached into the ground water (being addressed as RCRA

remediation). (b) To quantify concern over ground water contamination of low mobility constituents, health risks (drinking water limits) should be specified for comparison with fate and transport model projections. (c) Burial ground caps do not provide much reduction in ground water contamination of low mobility constituents, except possibly for bio-barrier caps, which extend the time of cap effectiveness. (d) Intruder protection provided by concrete cover was needed for designated hot spots in the burial ground. Discrepancy between assumed 500-year life of concrete cover and projected intruder protection up to 10,000 years was noted. (e) Waste removal from the hot spots was generally high cost and sometimes of limited implementability.

Mr. McDonell concluded the CMS/FS documentation, with clarifications noted, was generally good as input to decision making on projected alternatives for CERCLA remediation of the burial ground.

A discussion on the intruder barrier resulted in Elmer Wilhite stating that the purpose of the barrier is to prevent inadvertent intrusion. The barrier could still be effective even as it was breaking down. It was asked how effective was the barrier suppose to be? Mr. Poe said that the bio-barrier was stated to be cobblestone in the report. He stated that the first people moving into the area would take the cobblestone and use it in the foundation of their home.

Mr. Wade Waters stated that he had to do a lot of research to understand the document. He said he didn't see enough concentration in the constituents of interest to require much action.

Mr. Poe recommended that there be an independent review of the document.

Mr. Crawford asked why the process was not streamlined. It appears that the CMS/FS goes all the way to determining the alternatives and then stops. After that, a Proposed Plan is developed using the same information contained in the CMS/FS. He suggested that the two be combined to streamline the process. Mike Griffith stated that the process had been streamlined. They had already taken 24 months off the process.

There was discussion of the RCRA and CERCLA process. It was felt that the public did not have a clear understanding of the processes. It was stated that the CMS was the RCRA part and the FS was the CERCLA part. In addition, the Statement of Basis was RCRA and the Proposed Plan was CERCLA. It was suggested that the public be educated on how the process works.

With no other comments on the CMS/FS, Mr. Poe continued to the RCRA Permit motion. Mr. Poe reviewed the major areas of the RCRA Permit. He stated that as in the CMS/FS motion, the RCRA Permit motion should be developed so that it can be approved at the full CAB meeting on May 25. Since the comments are due to DHEC by May 27, it was determined that Ms. Patterson will propose an extension to the public comment period be extended to assure inclusion of the CAB motion.

In the interest of time, Mr. Poe stated his comments on the RCRA Permit. He felt the point of compliance should be at the mouth of Four-Mile Branch. The Point of Compliance could change when the institutional control changes. It was determined the terminology should be Point of Exposure, not Point of Compliance. It was also stated that the document should be written so the public understands it. In addition, the language such as "install and operate" and "capture and remediate" should be changed. It was suggested that the number of wells and monitoring times could be reduced to save money and time. It was questioned why the residential standards were being used instead of the industrial standards.

Gene Rollins requested a copy of the update to the intruder barrier analysis. Mr. Griffith said he would get it for Mr. Rollins and others also.

With no other comments on the RCRA Permit motion, the next meeting was scheduled for May 19, 3:00 p.m., Aiken Federal Building. This would be a short meeting to review wording on both motions. Ms. Patterson suggested that two other subjects would be discussed, they are dilution water flow in Four-Mile Branch and Dose to intruders living on the Old Burial Ground.

Ms. Patterson adjourned the meeting.

Meeting handouts may be obtained by calling 1-800-249-8155.